

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS (LULAC), et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action No. 3:21-cv-259
(DCG-JES-JVB)
(consolidated cases)

**UNOPPOSED MOTION FOR LEAVE TO FILE EXCESS PAGES IN
UNITED STATES' RESPONSE TO MOTION TO QUASH**

The United States respectfully requests leave to exceed the page limitation on discovery and case management motions in moving to enforce document subpoenas issued to Texas Legislators and Legislative Staff. The Legislators and Legislative Staff do not oppose this request.

Western District of Texas Local Rule CV-7(C)(2) discovery motions to ten pages. The United States seeks leave to file a motion to enforce document subpoenas that is thirteen pages in length. The excess pages will allow the United States to address the myriad privilege issues raised by over 500 pages of privilege logs provided by the Legislators and Legislative Staff. The Legislators and Legislative Staff do not oppose this motion to file excess pages and will not be prejudiced by the relief requested. A proposed order is attached hereto, along with the United States' proposed Motion to Enforce Document Subpoenas and related exhibits.

DATE: June 17, 2022

Respectfully submitted,

PAMELA S. KARLAN
Principal Deputy Assistant Attorney General
Civil Rights Division

/s/ Daniel J. Freeman
T. CHRISTIAN HERREN, JR.
TIMOTHY F. MELLETT
DANIEL J. FREEMAN
JANIE ALLISON (JAYE) SITTON
MICHELLE RUPP
JACKI L. ANDERSON
JASMIN LOTT
HOLLY F.B. BERLIN
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

CERTIFICATE OF CONFERRAL

Pursuant to Local Rule CV-7(g), I hereby certify that on June 17, 2022, counsel for the United States conferred by email with counsel for Legislators and Legislative Staff regarding this request. Legislators and Legislative Staff do not oppose the requested relief.

/s/ Daniel J. Freeman

Daniel J. Freeman
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Ave, NW
Washington, DC 20530
(202) 305-5451
daniel.freeman@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2022, I electronically filed the foregoing with the Clerk of the court using the CM/ECF system, which will send notification of this filing to counsel of record.

/s/ Daniel J. Freeman

Daniel J. Freeman
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Ave, NW
Washington, DC 20530
(202) 305-5451
daniel.freeman@usdoj.gov